



Air Pollution Control Board

San Diego County Air Pollution Control District

AGENDA ITEM

Governing Body

GREG COX
First District

DIANNE JACOB
Second District

PAM SLATER-PRICE
Third District

RON ROBERTS
Fourth District

BILL HORN
Fifth District

DATE: November 9, 2011

AP01

TO: Air Pollution Control Board

SUBJECT: NOTICED PUBLIC HEARING – ADOPTION OF AMENDMENTS TO RULE 67.16 – GRAPHIC ARTS OPERATIONS AND RELATED AMENDMENTS TO RULE 11 – EXEMPTIONS FROM RULE 10 PERMIT REQUIREMENTS (DISTRICT: All)

SUMMARY:

Overview

The Air Pollution Control Board is requesting to adopt proposed amendments to Rule 67.16, which limits emissions of volatile organic compounds from inks, cleaning solvents, and other graphics arts materials used in printing operations. Volatile organic compounds emitted into the atmosphere contribute to the formation of ozone, which at elevated levels can impact public health. Despite substantial air quality improvement over the past two decades, San Diego County has not yet attained state and federal air quality standards for ozone.

The amendments, if adopted, will reduce the allowable amount of volatile organic compounds in fountain solutions, cleaning solvents, and adhesives used in printing operations, consistent with recent federal guidelines and existing requirements of several air districts in California. The amendments help fulfill state and federal requirements to update rules as necessary to reflect the current state of air pollution control technology.

In addition, related amendments are proposed for Rule 11 (Exemptions from Rule 10 Permit Requirements) pertaining to the digital printing industry. Digital printing is an evolving technology that in many cases uses inks and other materials containing volatile organic compounds, although the extent of emissions is currently unknown. The proposed amendments to Rule 11 exempt digital printing operations from air quality permits but require large operations (as defined) to keep records on the use of inks and cleaning solvents as specified in Rule 67.16. These records will enable future assessment of emission levels and the potential need for pollution control requirements specific to the digital printing industry.

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Recommendation(s)

AIR POLLUTION CONTROL OFFICER

1. Find that the adoption of amendments to Rule 67.16 and Rule 11 is categorically exempt from the provisions of the California Environmental Quality Act pursuant to California Code of Regulations, Title 14, Section 15308, as an action taken to assure the protection of the environment, where the regulatory process involves procedures for protection of the environment, and pursuant to California Code of Regulations Title 14, Section 15061(b)(3), since it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment.
2. Adopt the resolution entitled Resolution Adopting Amendments to Rule 67.16 – Graphic Arts Operations of Regulation IV and Related Amendments to Rule 11 – Exemptions from Rule 10 Permit Requirements of Regulation II of the Rules and Regulations of the San Diego County Air Pollution Control District..]

Fiscal Impact

The proposed amendments to Rule 67.16 and Rule 11 will be implemented and enforced with existing staff and will not have a fiscal impact on the Air Pollution Control District.

Business Impact Statement

Adopting the proposed amendments to Rule 67.16 will not adversely impact the business community. The proposed graphics arts and cleaning materials with a lower content of volatile organic compounds are widely available and equally priced, or only marginally more expensive. Many printing facilities already comply with the proposed amendments. Furthermore, the amendments will not take effect for six months, allowing time to deplete existing inventories of non-compliant materials.

No additional permit requirements will result from the amendments to Rule 11. Thus, this action will not adversely impact the business community.

Advisory Board Statement

At its meeting on August 10, 2011, with a quorum present, the Air Pollution Control District Advisory Committee voted 3 to 1 in support of the Air Pollution Control District's recommendations.

BACKGROUND:

San Diego County does not currently meet the National and State Ambient Air Quality Standards for ozone and therefore is classified as an ozone nonattainment area. National and state laws require the San Diego County Air Pollution Control District (District) to implement rules that reduce emissions of ozone precursors – volatile organic compounds (VOCs) and oxides of nitrogen.

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Existing Rule 67.16 regulates VOC emissions from inks, cleaning solvents, and other graphic arts materials used in printing operations. The rule was adopted in 1988 and last revised in 1996. The primary objective in amending Rule 67.16 is to ensure ongoing compliance with federal Reasonably Available Control Technology (RACT) requirements applicable to the printing industry. The proposed amendments comply with federal Control Techniques Guidelines for printing operations, recently issued by the U.S. Environmental Protection Agency (EPA). Accordingly, amended Rule 67.16 will implement current RACT as required by the federal Clean Air Act.

The proposed amendments to Rule 67.16 reduce the VOC content limit for fountain solutions (used to repel ink from non-printing areas) from 15% to 5%, or to 8.5% if the fountain solution is chilled to reduce evaporation of VOCs into the atmosphere. The VOC content limit for cleaning solvents is reduced from 200 grams/liter to 100 grams/liter. Alternatively, a facility may use cleaning solvents with a low vapor pressure (low evaporation rate). The VOC content limit of adhesives is reduced from 300 grams/liter to 150 grams/liter.

In addition, the proposed rule amendments address the issue of estimating VOC emissions from digital printing operations, which are not presently quantified. The amendments exempt digital printing operations but require facilities using high-capacity digital printing equipment, as defined, to keep monthly or daily records of the amounts of inks and cleaning solvents used and their VOC content. Information obtained as a result of this provision will allow the District to evaluate the potential necessity of VOC emissions control at digital printing operations and whether to continue the record keeping requirements.

The proposed rule amendments also update the test methods for determining the VOC content of graphic arts and cleaning materials and the overall efficiency of emission control systems. In addition, the amendments include updated and new definitions, including those for digital printing operations.

There are 16 facilities in San Diego County that are currently subject to Rule 67.16, with total VOC emissions from printing operations of approximately 64 tons/year. The rule amendments will reduce VOC emissions by approximately 10.5 tons/year or 16%.

In conjunction with the proposed exemption in Rule 67.16 for digital printing operations, corresponding amendments to Rule 11 (Exemptions from Rule 10 Permit Requirements) are also proposed. The amendments will exempt digital printing operations from air quality permit requirements—in fact, no such operations currently have an air quality permit—but will require facilities using high-capacity digital printing equipment to keep records as specified in Rule 67.16.

Rule 67.16 addresses federal requirements and therefore is included in the State Implementation Plan (SIP). Upon its adoption, the amended rule will be submitted to EPA as a SIP revision.

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Socioeconomic Impact Assessment

Section 40728.5 of the State Health and Safety Code requires the District to assess the socioeconomic impacts when adopting, amending, or repealing a rule that will significantly affect air quality or emission limitations. The assessment must include an evaluation of small business impacts. The proposed amendments to Rule 67.16 contain new, lower VOC emission limitations for graphic arts materials and cleaning agents used in printing operations. Accordingly, a Socioeconomic Impact Assessment has been prepared (Attachment B), which shows that the rule amendments will not have significant economic impact on the affected industry, including small business.

Environmental Statement

The amendment of Rule 67.16 and 11 are exempt from the California Environmental Quality Act (CEQA) pursuant to California Code of Regulations, Title 14, Section 15308, as an action taken to assure the protection of the environment, where the regulatory process involves procedures for protection of the environment. In this case, this action is being taken in response to federal and state requirements to reduce emissions of VOCs in order to achieve ambient air quality standards. Additionally, this action is also exempt pursuant to California Code of Regulations Title 14, Section 15061(b)(3), since it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment. Many affected facilities already comply with the proposed requirements and compliant materials are widely available and in use.

Linkage to the County of San Diego Strategic Plan

The County's five-year strategic plan includes an Environment Initiative to ensure environmental preservation and enhance quality of life. Proposed amendments to Rule 67.16 will codify the use of graphic arts materials with lower emissions of volatile organic compounds without negatively impacting the local business community. The rule balances air quality preservation, public health protection, and economic development needs.

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Respectfully submitted,



SARAH E. AGHASSI
Deputy Chief Administrative Officer



ROBERT J. KARD
Air Pollution Control Officer

ATTACHMENT(S)

- Attachment A – Resolution Adopting Amendments to Rule 67.16 – Graphic Arts Operations of Regulation IV and Related Amendments to Rule 11 – Exemptions from Rule 10 Permit Requirements of Regulation II of the Rules and Regulations of the San Diego County Air Pollution Control District
- Attachment B – Socioeconomic Impact Analysis
- Attachment C – Comparative Analysis
- Attachment D – Incremental Cost Effectiveness Analysis
- Attachment E – Workshop Report
- Attachment F – Rule 67.16 Change Copy
- Attachment G – Rule 11 Change Copy

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AGENDA ITEM INFORMATION SHEET |

REQUIRES FOUR VOTES: ☐ Yes ☒ No

WRITTEN DISCLOSURE PER COUNTY CHARTER SECTION 1000.1 REQUIRED
☐ Yes ☒ No

PREVIOUS RELEVANT BOARD ACTIONS:

May 15, 1996 (APCB #2), Amendment of Rule 67.16 – Graphic Arts Operations; April 25, 2007 (APCB #1), Amendment of Rule 11 – Exemptions from Rule 10 Permit Requirements

BOARD POLICIES APPLICABLE: N/A

BOARD POLICY STATEMENTS: N/A

MANDATORY COMPLIANCE: N/A

ORACLE AWARD NUMBER(S) AND CONTRACT AND/OR REQUISITION NUMBER(S): N/A

ORIGINATING DEPARTMENT: Air Pollution Control District

OTHER CONCURRENCE(S): N/A

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